

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF KENTUCKY )  
UTILITIES COMPANY FOR AN ADJUSTMENT )  
OF ITS ELECTRIC RATES AND FOR CERTIFICATES ) CASE NO. 2016-00370  
OF PUBLIC CONVENIENCE AND NECESSITY )

-and-

ELECTRONIC APPLICATION OF LOUISVILLE GAS )  
AND ELECTRIC COMPANY FOR AN ADJUSTMENT )  
OF ITS ELECTRIC AND GAS RATES AND FOR ) CASE NO. 2016-00371  
CERTIFICATES OF PUBLIC CONVENIENCE AND )  
NECESSITY )

**THE ATTORNEY GENERAL'S OBJECTIONS TO CERTAIN DISCOVERY  
REQUESTS**

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby provides his Objections to Certain Discovery Requests propounded in the above-style matters. The Attorney General is providing his objections four (4) days prior to the established due date, pursuant to Commission's Orders dated December 13, 2016.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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***Certificate of Service and Filing***

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on March 27, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 27<sup>th</sup> day of March, 2017.



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Assistant Attorney General

Application of Kentucky Utilities Co. for an Adjustment  
of its Electric Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00370  
Attorney General's Responses to Kentucky Utilities Company

**WITNESS/RESPONDENT RESPONSIBLE**

**Larry W. Holloway, P.E./Counsel as to Objections**

**REQUEST No.2**

**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Holloway in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Holloway, please provide an electronic version of those documents with all formulas intact.

RESPONSE: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, the respondent will supplement this response on March 31, 2017.

Application of Kentucky Utilities Co. for an Adjustment  
of its Electric Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00370  
Attorney General's Responses to Kentucky Utilities Company

**WITNESS/RESPONDENT RESPONSIBLE**  
**Ralph C. Smith/ Counsel as to Objections**

**REQUEST No.6**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Smith in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Smith, please provide an electronic version of those documents with all formulas intact.

RESPONSE: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, the respondent will supplement this response on March 31, 2017.

Application of Kentucky Utilities Co. for an Adjustment  
of its Electric Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00370  
Attorney General's Responses to Kentucky Utilities Company

**WITNESS/RESPONDENT RESPONSIBLE**  
**Glenn A. Watkins/Counsel as to Objections**

**REQUEST No.7**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Watkins in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Watkins, please provide an electronic version of those documents with all formulas intact.

RESPONSE: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, the respondent will supplement this response on March 31, 2017.

Application of Louisville Gas & Electric Co. for an Adjustment  
of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00371  
Attorney General's Responses to Data Requests of Louisville Gas & Electric Co.

**WITNESS/RESPONDENT RESPONSIBLE:  
LARRY HOLLOWAY/ Counsel as to Objections**

**QUESTION No. 2  
Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Holloway in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Holloway, please provide an electronic version of those documents with all formulas intact.

RESPONSE: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, the respondent will supplement this response on March 31, 2017.

Application of Louisville Gas & Electric Co. for an Adjustment  
of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00371  
Attorney General's Responses to Data Requests of Louisville Gas & Electric Co.

**WITNESS/RESPONDENT RESPONSIBLE:**  
**RALPH SMITH/ Counsel as to Objections**

**QUESTION No. 6**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Smith in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Smith, please provide an electronic version of those documents with all formulas intact.

RESPONSE: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, the respondent will supplement this response on March 31, 2017.

Application of Louisville Gas & Electric Co. for an Adjustment  
of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00371  
Attorney General's Responses to Data Requests of Louisville Gas & Electric Co.

**WITNESS/RESPONDENT RESPONSIBLE:**  
**GLENN WATKINS/ Counsel as to Objections**

**QUESTION No. 7**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Watkins in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Watkins, please provide an electronic version of those documents with all formulas intact.

RESPONSE: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, the respondent will supplement this response on March 31, 2017.